

ENTERED

July 27, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

STRIKE, LLC, *et al.*¹

Wind-Down Debtors.

)
) Chapter 11
)
) Case No. 21-90054 (DRJ)
)
) (Jointly Administered)
)**STIPULATION AND AGREED ORDER BY AND AMONG THE DEBTORS AND
CONSOLIDATED ELECTRICAL DISTRIBUTORS MODIFYING THE DISCHARGE
INJUNCTION** (Docket No. 1172)

The above-captioned debtors and debtors in possession (prior to the Effective Date,² the “Debtors” and, after the Effective Date, the “Wind-Down Debtors”) and Consolidated Electrical Distributors (the “Movant” and, together with the Debtors, the “Parties”) hereby enter into this stipulation (the “Stipulation”) and agree as follows:

RECITALS

WHEREAS, on December 6, 2021 (the “Petition Date”), the Debtors filed the above-captioned bankruptcy cases;

WHEREAS, on May 18, 2022, the above-referenced Court confirmed the *Debtors’ Second Modified Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Strike, LLC*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Strike, LLC (2120); STH ShellCo LLC (*f/k/a* Strike HoldCo, LLC) (0607); Delta Directional Drilling, LLC (9896); SGH ShellCo LLC (*f/k/a* Strike Global Holdings, LLC) (4661); CIS ShellCo LLC (*f/k/a* Capstone Infrastructure Services, LLC) (0161); and Crossfire, LLC (7582). The location of Debtor Strike, LLC’s principal place of business and the Debtors’ service address is: 460 Wildwood Forest Dr., Suite 350, Spring, Texas 77380. Additional information regarding this case may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/StrikeLLC>.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Second Modified Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Strike, LLC and Its Affiliated Debtors* [Docket No. 1094] (the “Plan”).

and its Affiliated Debtors (the “Plan”) [*see* Confirmation Order, Docket No. 1111];

WHEREAS, the Effective Date of the Plan occurred on June 6, 2022 [*see* Notice at Docket No. 1151];

WHEREAS, on June 21, 2022, the Movant filed its *Motion for Relief from the Automatic Stay to Allow State Court Litigation to Proceed* (the “Motion”) [Docket No. 1172];

WHEREAS, on July 5, 2022, the Wind-Down Debtors filed their Response to the Motion [Docket No. 1193];

WHEREAS, the Plan enjoins the Movant from pursuing litigation against the Debtors;

WHEREAS, the Parties have agreed to modify the Plan injunction on the terms and conditions set forth in this Stipulation and Agreed Order in full and final resolution of the Motion.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The above recitals are incorporated by reference into this Stipulation and Agreed Order.
2. The Plan injunction is modified solely to the limited extent necessary to enable the Movant to name the Debtors in a mechanics’ lien foreclosure lawsuit.
3. The Movant shall not seek to adjudicate any claims against the Debtors or Wind-Down Debtors.
4. The Movant shall not seek recovery from any of the Debtors, the Wind-Down Debtors, their property, their estates, or their successors.
5. Each of the Parties to this Stipulation and Agreed Order represents and warrants that it is duly authorized to enter into and be bound by this Stipulation.

6. The Bankruptcy Court retains exclusive jurisdiction with respect to any disputes arising from or other actions to interpret, administer, or enforce the terms and provisions of this Stipulation.

Signed: July 27, 2022.



DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

AGREED TO:

Houston, Texas

July 25, 2022

/s/ Genevieve Graham

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